UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JUAN TAJALLE,

Plaintiff

vs.

CITY OF SEATTLE, SEATTLE PUBLIC LIBRARY, **OFFICER SAM 8**, a.k.a. **JOHN DOE #1**, and **JOHN DOE #2**,

Defendants

No. C07 1509 TSZ

PLAINTIFF'S INITIAL DISCLOSURES

Comes Now the plaintiff in the above case, who makes his initial disclosures as required by FRCP 26(a)(1):

(A) Witnesses:

1) Juan Tajalle c/o John Scannell, ActionLaw.net, P.O. Box 3254, Seattle, Wash., 98114, will be called to testify as to his version of the events described in the complaint
2) David Adams, c/o Seattle City Atorney's Office, P.O. Box 94769, Seattle, Wash., 98124 may be called to testify to his version of the events described in the complaint.
3) Ulysses Ramabayon, c/o Seattle Ctiy attorney's Office, P.O. Box 94769, Seattle, Wash., 98124 may be called to testify to his version of the events described in the

Software © 1996 by "Zamboni" John Scannell

ACTIONLAW.NET
P.O. BOX 3254
SEATTLE, WASH., 98114
206-624-3685

Dockets.Justia.com

complaint.

4) Plaintiff reserves the right to call defendant's witnesses as his witnesses.

(B) Documents: Medical records which are attached. Two exclusion orders attached. Plaintiff reserves the right to introduce defendant's documents.

(C) Damages: $2,000 Attorney Fees.

Tens unit $250.00

CD player $50.00

Headphones $40.00

Radio Cassette player $70.00

$80,000 humiliation, mental anguish

$100,000 punitive damages.

(D) Not applicable.

Dated this 1st day of January, 2008,

/S/______________________________
John Scannell, WSBA #31035

Software © 1996 by "Zamboni" John Scannell

ACTIONLAW.NET
P.O. BOX 3254
SEATTLE, WASH., 98114
206-624-3685